

RESEARCH PARTICIPANT REIMBURSEMENT PROCEDURES

Objective:

Describe the procedures for processing reimbursements to research participants.

1. Responsibilities:

- a) Principal Investigators (PI) planning to reimburse research participants for study participation are responsible for:
 - I. Disclosing the terms and conditions of participant reimbursement in the research protocol.
 - II. Indicating the amount, schedule, and type (cash, check, gift card, etc.) of reimbursement in the Informed Consent Form (ICF).
 - III. Including the “Compensation” language as described in the Atlanta VA Health Care System (AVAHCS) ICF template as appropriate
 - IV. Ensuring that reimbursements are appropriately prorated, and they do not constitute or appear as undue pressure and/or coercion on the subject to volunteer for, or to continue participating in the research study.
- b) The PI and/or designee are responsible for managing money received from the Agent Cashier or other sources.

2. Foundation for Atlanta Veterans Education and Research, Inc. (FAVER) Payment Procedures:

- a) The PI or designee/research coordinator should contact the FAVER Executive Director of Grants and Contracts Specialist to discuss payment procedures prior to starting study enrollment.
- b) The PI may authorize, in writing, a member(s) of the research team to manage a petty cash account.
- c) The research protocol and informed consent must be IRB approved, and a research agreement with the study sponsor must have been executed with funds already in place before payments are processed.
- d) Payments to research participants can be made either by check, petty cash, or debit card. Payment is to cover per diem expenses (i.e. lunch, car fare).
 - 1. Check:
 - i. If research participant payments are to be made by check, the research coordinator is required to complete and submit a “Study Subject Payment Request” form for each payment made to research participants. This form is available at <https://faver.foundation/faveronline> in the Forms section. Note: you must be logged in to FAVEROnline to have access to this form. This form is used when checks are to be mailed directly to a research

participant or if the research coordinator requests a check in advance so that it can be hand delivered to the research participant on the day of their study visit. If advance checks are requested, the research coordinator must submit request(s) 1 week in advance of the study visit.

2. Petty Cash:

- i. Depending on the needs of the study and with proper justification from the Principal Investigator, FAVER also has the ability to set up a petty cash account for the Investigator or designee. The amounts of the payments are to be discussed with the FAVER Controller.
- ii. The PI or the research coordinator will need to open a “Holiday” account with the Associated Credit Union located on the main floor of AVAHCS. Note that this is a personal credit union account. This account will be merged with your other account(s) if you already have an Associated Credit Union account. The account cannot overlap with existing accounts.
- iii. Once the account has been opened, the PI or the research coordinator must provide the banking information to the FAVER Controller in order for direct deposit to be set up.
- iv. Before funds are made via direct deposit to the Holiday account, a Security SOP Agreement must be signed by the PI or research coordinator and FAVER Controller. A lock box with a unique code will be issued for use by the FAVER Controller.
- v. If research participant payments are made by cash, the research coordinator is required to complete and submit a “Study Subject Cash Payment Form”. This form is used if cash payment is made at the time of the visit to the research participant. The research coordinator must have the research participant sign the “Study Subject Cash Payment Form” before a cash payment is made. This form is available at in the Forms section. Note: you must be logged in to FAVEROnline <https://faver.foundation/faveronline> to have access to this form.
- vi. When additional petty cash funds are needed, please email the FAVER Controller as FAVER tracks balances and will deposit additional funds as needed, usually the next business day.
- vii. Petty Cash Reconciliation is completed semi-annually. Bank statements and “Study Subject Cash Payment Forms” will be used during the reconciliation process.

3. Debit Card:

- i. At FAVER’s discretion, research participant payments for some studies will be administered using a debit card.

- ii. Greenphire is the debit card provider and the debit card is called a “ClinCard”. Please refer to the ClinCard Reference guide provided by FAVER for information.
- iii. At study initiation FAVER will inform the PI and research coordinator that the ClinCard system will be used to manage research participant payments for a specific study.
- iv. FAVER will be responsible for distributing ClinCard debit cards to the PI and/or research coordinator and to also provide training to the study team.
- v. Before the debit cards and lockbox are issued to the study team, the study team must complete the following steps:
 - a) A Greenphire ClinCard Debit Card Security SOP Agreement must be signed by the research coordinator and FAVER Controller. A lock box with a unique code will be issued for use by the FAVER Executive Director of Grants and Contracts Specialist.
 - b) VA HIPAA: The stand-alone HIPAA document or the HIPAA section of the combined ICF/HIPAA template must list that the research team will disclose information to Greenphire, Inc.
 - c) VA Informed Consent Form:
 - I) Include Greenphire, Inc. in the “How Will My Private Information Be Protected” section of the VA Informed Consent Form.
 - II) Include the following language in the VA Informed Consent Form in the “Compensation” section:

“COMPENSATION:

*You will get compensated for time and travel. You will get **\$XX.XX** for research clinic visits and **\$XX.XX** for research phone visits. **(If the subjects will be paid for unscheduled clinic visits, include that information here).** It will be on a ClinCard, which works like a debit card. It is provided by Greenphire. When visits are completed, funds will be loaded onto your card. You will be able to use the funds in approximately 1 business day. You will have up to **XX** clinic visits over the period of the study (total that you can receive is **\$XXXX.XX**).*

*Greenphire and its Customer Support members will have access to your **name, address, and date-of-birth** (enter as appropriate. You are not required to list all items). This information will help them provide customer service in case you have questions or need support while using the ClinCard.*

Do not disclose participants social security number when using a ClinCard issued by FAVER.

- vi. Once the steps outlined in bullet 3.v. above have been completed, provide copies of the IRB approved Informed Consent form and HIPAA form(s) to FAVER.

3. VA Payment Procedures

- a) Reimbursements to research participants made with VA funds can be made by Direct Express Card, Direct Deposit (EFT), check, or in extenuating circumstances, cash.
- b) Direct Deposit is the preferred method of payment. Cash will be allowed on a case by case basis and must be approved by the Research Office and Fiscal.
- c) Reimbursement procedures should be discussed with the AVAHCS research budget analyst or Director of Research Operations (DRO) prior to starting study enrollment. During the discussion, provide a copy of the signed & dated approved Informed Consent Form clearly stating the reimbursement amount(s) and payment schedule.
- d) ICF and HIPAA
 - I. If using Direct Express Card or Direct Deposit, list “US Dept. of Treasury and Comerica Bank” in the compensation section of the ICF and in the HIPAA.
- e) **Direct Express Card:**
 - I. For participants WITHOUT a Direct Express Card, complete the “Direct Express with NO Comerica Card Form” located below. This is required only once per research participant. If the participant is not sure if they have a Direct Express Card, complete the form. This is the process to get a card.
 - [Without any existing Card](#)
 - II. For participants WITH a Direct Express Card, complete the Direct Express Card Form below
 - [With Comerica Card](#)
- f) **Payment with Direct Express Card**
 - I. Submit the Check/Direct Deposit Reimbursement Form to the Research Office (Budget Assistant or DRO) **using encrypted** email to: roderick.tuttle@va.gov or bring to room 5A104.

http://www.atlanta.va.gov/Docs/VA_Research_Participant_Check_Payment_Form.pdf
 - II. Email the appropriate Direct Express Card Form **using encryption** and without changing the name of the file to VHAATGAccounting@va.gov. You can do this for single or multiple individuals.

- III. The Research Office will submit payment requests weekly to Fiscal.
- IV. The Direct Express card will be loaded with the payment for those participants who already have the Direct Express Card. The Direct Express Card will be mailed to those participants who do not already have one.

g) Direct Deposit

I. First payment:

- a) Ask the participant if he/she is enrolled in direct deposit VA. This can be verified through the agent cashier or by encrypted email to Roderick.Tuttle@va.gov
 - 1) If not, have participant complete the “FMS Vendor File Request Form”
<https://www.atlanta.va.gov/Docs/directdepositvendorform.pdf> .
 - 2) Bring form to agent cashier located on the main floor
- b) Complete the “Check/Direct Deposit Reimbursement Form” and submit to the Research Office via **encrypted** email to: roderick.tuttle@va.gov or bring to room 5A104.

To locate the form go to:

http://www.atlanta.va.gov/Docs/VA_Research_Participant_Check_Payment_Form.pdf

- II. Subsequent payments: complete the “Check/Direct Deposit Reimbursement Form” and submit to the Research Office (Budget Assistant or DRO) via **encrypted** email to: roderick.tuttle@va.gov or bring to room 5A104.
- III. The Direct Deposit payment will be made to the registered bank account.

h) Payment with Cash

- I. Complete and sign the “Cash Reimbursement Form” (AVAHCS Research 151 Payment Form). The form is available on the AVAHCS research website in the “Subject Reimbursement” section. Include the obligation number provided to you by the Research Office. Obligation numbers tend to change with the new Fiscal Year (October 1). It is critical that you keep up to date with the obligation number.
- II. Complete a request form for each participant for each visit and deliver the form to the Director Research Operations or the budget analyst for signature and obligation number. This must be done before the participant can be paid.
- III. The study coordinator should call the participant to confirm the study appointment or wait for them to arrive before having the Reimbursement Form signed.
- IV. A study staff member must accompany the participant to the Agent Cashier with the form to receive cash payment.
- V. Participants are required to sign the request form when receiving cash

payment. Ensure to request a photocopy of the signed and dated form for your records.

VI. Business hours for the Agent Cashier are 8:00 AM to 4:00 PM, Monday through Friday excluding holidays.

i) **Payment by Check**

- I. Complete the "Check/Direct Deposit Reimbursement Form" after the completion of the study visit and email using encryption to: roderick.tuttle@va.gov or bring to room 5A104. This form is available on the AVAHCS research website in the Subject Reimbursements section. Research participants can expect delivery of the check in about 4-6 weeks.

j) **Documentation**

- I. The research team must maintain clear documentation of any subject's reimbursement in the team's locked files.
- II. Documentation is subject to review by the Inspector General, Compliance Officer, Business Integrity Officer, the Comptroller General and any other compliance entity.